

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Opposition to Skyryse’s Motion to Compel Production of Documents
2. Attached as Exhibit “A” is a true and correct copy of Moog’s Responses to Skyryse’s First Set of Requests for Production of Documents, served on April 13, 2022.
3. Attached as Exhibit “B” is a true and correct copy of correspondence between Moog’s counsel and Skyryse’s counsel from June 24 to 28, 2022.

4. Attached as Exhibit “C” are the documents Moog produced in response to Skyryse’s RFP No. 11, produced in this litigation as “HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL AND EXPERTS’ EYES ONLY” and bates numbers MOOG0020503, 20513, 20523, 20524, 20552, 20555.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: July 11, 2022

/s/ Rena Andoh
Rena Andoh